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**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

**SAN FRANCISCO DIVISION**

ANIBAL RODRIGUEZ, et al. individually and on  
behalf of all others similarly situated,

Plaintiff,

vs.

GOOGLE LLC,

Defendant.

Case No. 3:20-CV-04688-RS

**JOINT STIPULATION AND  
[PROPOSED] ORDER EXTENDING  
BRIEFING SCHEDULE ON  
PLAINTIFFS' MOTION FOR RELIEF  
FROM CASE MANAGEMENT  
SCHEDULE**

Judge: Hon. Richard Seeborg

Courtroom: 3, 17<sup>th</sup> Floor

Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiffs Anibal Rodriguez, et al. (“Plaintiffs”) and Defendant Google LLC (“Google”), collectively the “Parties,” submit this joint stipulation.

WHEREAS, on December 21, 2022, Plaintiffs filed a Motion for Relief from the Case Management Schedule (the “Motion”), seeking to extend the deadlines for service of opening expert reports by two months (Dkt. 279);

WHEREAS, on December 23, 2022, the Court partially granted the Motion, extending the deadlines for service of opening expert reports by one month and maintaining the briefing schedule on Plaintiffs’ request for a longer extension (Dkt. 282);

WHEREAS, under the existing schedule, Google must file any brief opposing the Motion on or before January 4, 2022; and

WHEREAS, to hopefully resolve the Motion and reduce the burden on the Court, the Parties are actively negotiating a schedule that would provide sufficient time to complete expert discovery while otherwise preserving the case schedule to the extent appropriate;

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the Parties, that the following dates and deadlines should apply to the briefing on the Motion (if the Parties are unable to resolve the Motion by stipulation):

- Google’s Opposition: January 11, 2022
- Plaintiffs’ Reply: January 18, 2023
- Hearing on the Motion: At the Court’s discretion, but proposed for February 2, 2023 at 1:30 p.m.

A Proposed Order is submitted concurrently herewith.

IT IS SO STIPULATED.

DATED: January 3, 2023

WILLKIE FARR & GALLAGHER, LLP

By: /s/ Eduardo E. Santacana  
Eduardo E. Santacana

*Attorneys for Defendant Google LLC*

DATED: January 3, 2023

By: /s/ Amanda Bonn  
Amanda Bonn (CA Bar No. 270891)

*Attorneys for Plaintiffs*

**FILER'S ATTESTATION**

Pursuant to Civil Local Rule 5.1, I attest that all signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized this filing.

DATED: January 3, 2023

SUSMAN GODFREY L.L.P.

/s/ Amanda Bonn

Amanda Bonn

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ANIBAL RODRIGUEZ, et al. individually and on  
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Case No. 3:20-CV-04688-RS

**[PROPOSED] ORDER EXTENDING  
DISCOVERY, CLASS CERTIFICATION  
BRIEFING SCHEDULE, AND  
HEARING DATE**

Judge: Hon. Richard Seeborg  
Courtroom: 3, 17<sup>th</sup> Floor

Pursuant to stipulation of the Parties, the Court hereby **ORDERS** that the deadlines for further briefing on Plaintiffs' Motion for Relief from the Case Management Schedule (Dkt. 279) are extended as follows:

- Google's Opposition: January 11, 2022
- Plaintiffs' Reply: January 18, 2023
- Hearing on the Motion: At the Court's discretion, but proposed for February 2, 2023 at 1:30 p.m.

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
Honorable Richard Seeborg